

EXHIBIT D

Megan Bennett

From: Wood, Benjamin <benjamin.wood@squirepb.com>
Sent: Monday, May 3, 2021 9:28 AM
To: Steven R. Pounian
Cc: SCarter1@cozen.com; zScott Tarbutton; zRobert Haefele; Andrew J. Maloney; Megan Bennett; John Fawcett; Berger, Mitchell
Subject: RE: Alp Karli

Dear Steve,

Mr. Karli is retired and living in Turkey. He is neither a U.S. citizen nor a U.S. resident, and is not subject to the court's jurisdiction. I am not authorized to accept service or provide his residence address.

Best regards,

Ben

Benjamin D. Wood
Squire Patton Boggs (US) LLP
T +1 202 457 6685
benjamin.wood@squirepb.com

From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Friday, April 30, 2021 2:39 PM
To: Wood, Benjamin <benjamin.wood@squirepb.com>
Cc: SCarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Berger, Mitchell <mitchell.berger@squirepb.com>
Subject: [EXT] RE: Alp Karli

Dear Ben

We had understood from your prior messages that Mr. Karli would appear without being compelled to testify, and were surprised and disappointed by your sudden reversal of position.

We can discuss a declaration but cannot defer formal process to secure Mr. Karli's appearance.

Will you please provide us with Mr. Karli's address, or agree to accept service of the attached subpoena for a remote deposition?

Regards,

Steve

Steven R. Pounian
Of Counsel

Kreindler & Kreindler LLP



485 Lexington Ave
New York, NY 10017

T: 212.973.3477 · E-mail: spounian@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

Please consider the environment before printing this e-mail.

From: Wood, Benjamin <benjamin.wood@squirepb.com>

Sent: Wednesday, April 28, 2021 12:01 PM

To: Steven R. Pounian <Spounian@kreindler.com>

Cc: SCarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Berger, Mitchell <mitchell.berger@squirepb.com>

Subject: RE: Alp Karli

Dear Steve,

After further consultation with our client in light of the FBI documents that you kindly provided, Mr. Karli will not volunteer for a deposition or interview in this matter.

If you have specific facts that you want him to verify and wish to provide us a draft declaration, we will review the draft and consider that possible approach.

Best regards,

Ben

Benjamin D. Wood

Squire Patton Boggs (US) LLP

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benjamin.wood@squirepb.com

From: Steven R. Pounian <Spounian@kreindler.com>

Sent: Tuesday, April 13, 2021 6:24 PM

To: Wood, Benjamin <benjamin.wood@squirepb.com>

Cc: SCarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Berger, Mitchell <mitchell.berger@squirepb.com>

Subject: [EXT] RE: Alp Karli

Dear Ben,

Thanks for your message.

The depositions to date have been conducted remotely by Zoom videoconference. A Golkow litigation team has been handling the arrangements. They can fill you in on the technical details. The Zoom link is sent to all

the participants in advance of the deposition. A technician handles the exhibits remotely, shares them with the lawyers on a separate platform, and with the witness on the Zoom platform.

Kind regards,

Steve

Steven R. Pounian
Of Counsel



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Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

Please consider the environment before printing this e-mail.

From: Wood, Benjamin <benjamin.wood@squirepb.com>
Sent: Tuesday, April 13, 2021 12:57 PM
To: Steven R. Pounian <Spounian@kreindler.com>
Cc: SCarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Berger, Mitchell <mitchell.berger@squirepb.com>
Subject: RE: Alp Karli

Dear Steve,

I did have an opportunity to review the FBI documents, and thank you again for sending them.

I am working on getting available dates, and expect to provide several to you shortly.

Could you please remind me about the logistical details of the deposition? I assume it would take place via videoconference or teleconference? It would help to have some lead time if I need to work with Mr. Karli to install and test any particular software or technology.

Best regards,

Ben

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From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Sunday, April 11, 2021 3:53 PM
To: Wood, Benjamin <benjamin.wood@squirepb.com>
Cc: SCarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>;

Andrew J. Maloney <AMalone@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett

<Jfawcett@kreindler.com>

Subject: [EXT] Alp Karli

Hello again Ben,

Hopefully you have now had an opportunity to review the FBI documents.

As you know, Plaintiffs would like to discuss the scheduling of Mr. Karli's deposition.

Could you please get back to us at your earliest opportunity with some available dates. If you would like, we can set up a call.

Thanks,

Steve

Steven R. Pounian

Of Counsel



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